

## US EPA ORD RTP Animal Care and Use Program and Proposed Adoption Policy

**Background.** The US EPA uses animals in research, including rabbits. It is incumbent on each research institution to ensure that the final disposition of research animals is humane and ethical. While euthanasia may be required for scientific purposes, at the end of some experiments, animals may be healthy with a natural expected lifespan.

**Current Care and Use Program.** ORD maintains a population of mammals and fish for research, including eight rabbits. These rabbits are used to produce sperm cells for in vitro reproductive toxicology testing (a new approach method or NAM), substituting cells for both human and rodent exposures. The males make the cells and the females encourage them to voluntarily donate those cells. The animals are never exposed or tested in any way, and each rabbit serves EPA research for years.

**Rabbit retirement.** Currently, the ORD rabbits are beneficiaries of a “Retire in Place” policy. When they can no longer produce sufficient viable sperm for scientific use or successfully encourage the donation of those cells, they are retired from duty but continue to live in the vivarium. They receive daily animal husbandry and veterinary care, socialize in the vivarium’s playroom, eat hay and fresh vegetables, are exposed to an assortment of mental and physical stimulation objects (“toys”), and receive extensive human interaction during grooming, exams, and trips to the playroom. They remain with the only caregivers they have known.

**Animal advocacy and EPA.** Public attention on ORD research animals has been focused on ORD’s rabbits. White Coat Waste (WCW) ran a billboard and social media campaign that pictured a white rabbit in a cage and the words, “She breathes diesel fumes. You pay the tax bill.” WCW’s stance is that data from animal research does not translate well to human health concerns; therefore, research performed by a Federal agency using animals wastes taxpayer funds.

**Proposed adoption policy.** It is common practice across the animal research community, including government, industry, and academic institutions, to adopt out animals who are viable candidates for life outside the lab. DOD, VA, UNC-Chapel Hill, North Carolina State University, and many other government, commercial, and local academic institutions have adoption programs. The ORD RTP Animal Resources Program Office (ARPO) proposed an EPA adoption policy in December 2017 to OGC. The ARPO program is unaware of any response to the draft policy; however, NHEERL management did inquire.

**Benefits of an EPA Animal Adoption Policy.** The proposed adoption policy provides an avenue for rabbits past their scientific utility to be adopted out. There are several benefits to an adoption program:

- An adoption process could be beneficial to the animals, facilitating a comfortable retirement for research animals that have completed their service.
- An adoption process could improve the EPA’s public image, assuring interested stakeholders that EPA was ensuring quality lives for our animals even beyond their period of service and not euthanizing them for convenience or cost savings.
- An adoption process reduces costs, shifting the cost of care for animals that can no longer serve the Agency mission off the government.
- An adoption program could serve the interest of other animals by providing long-term living solutions for other mammals and even populations of fish.

**Next steps.** Because the adoption program was proposed prior to the standing up of ORM’s Improvement and Accountability Division which coordinates any new ORD policy, ORM’s IAD will examine the proposed agreements associated with the program and will determine an appropriate course of action to have the program considered and potentially launched.